

#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

MAR - 8 2023

BONNIE HACKLER Clerk, U.S. District Court

Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDUARDO GARCIA a/k/a Eduardo Garcia Olvera a/k/a Eduardo Olvera Garcia a/k/a Lalo, ERIC LOPEZ, ERIC JESUS LOPEZ, SAVANNA JADE LOPEZ, CHRISTIAN LOPEZ, and FRANCISCO HERNANDEZ,

Defendants.

#### SEALED

Case No. 23 CR 044 JFH

By.

#### INDICTMENT

The Federal Grand Jury charges:

#### COUNT ONE

## FELON IN POSSESSION OF A FIREARM [18 U.S.C. §§ 922(g)(1) & 924(a)(8)]

On or about November 4, 2022, in the Eastern District of Oklahoma, the defendant, EDUARDO GARCIA a/k/a Eduardo Garcia Olvera a/k/a Eduardo Olvera Garcia a/k/a Lalo, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting interstate commerce, the following firearms, to-wit:

- One (1) 20 GA Browning Light Twenty shotgun, serial number 07218NV231;
- One (1) 20 GA Mossberg model 185K shotgun with no serial number;
- One (1) 9mm LUGER Ruger PC Carbine, serial number 912-66302,

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

## **COUNTS TWO THROUGH TWENTY-FIVE**

# FALSE STATEMENT DURING PURCHASE OF A FIREARM [18 U.S.C. § 924(a)(1)(A)]

On or about the dates set forth below, in the Eastern District of Oklahoma, the defendants set forth in each Count contained within the table below, knowingly made a false statement and representation to the licensed dealer noted in each Count below, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the licensed dealer set forth in each Count below, in that each defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that they were the actual buyer of the firearm indicated on the Form 4473, when in fact as each defendant then knew, they were not the actual buyer of the firearm:

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
2	October 2, 2021	Christian Lopez	Double D Pawn & Gun	Keltec Model PMR-30 S/N WY7H59 22WMR pistol.
3	October 9, 2021	Christian Lopez	Double D Pawn & Gun	SDS Imports Model M12PT S/N 52-H21YB- 002714 12g shotgun.
4	November 16, 2021	Eric Lopez	H&H Pawn, Gun & Tools, Inc.	(1) Smith & Wesson Model M&P EZ Shield S/N RES9114 380 pistol; (2) Smith & Wesson Model M&P 15-22P S/N WAK9524 22 pistol.

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
5	November 23, 2021	Christian Lopez	Roadrunner Gun & Pawn, LLC	(1) Kel-Tec Model PMR30 S/N WY7R75 22 WMR pistol; (2) Kel-Tec Model PMR30 S/N WY7R73 22 WMR pistol.
6	January 21, 2022	Eric Jesus Lopez	Double D Pawn & Gun	(1) Glock Model 17 S/N ABPD482 9mm pistol; (2) Glock Model 17 S/N BVBN801 9mm pistol; (3) Glock Model 17 S/N BUMU943 9mm pistol; (4) Glock Model 19 S/N BVUN961 9mm pistol.
7	February 2, 2022	Savanna Jade Lopez	Double D Pawn & Gun	(1) Tippmann Model M4-22 S/N 041777 22LR pistol; (2) Tippmann Model M4-22 S/N 041775 22LR pistol; (3) Glock Model 44 S/N AGEL855 22LR pistol; (4) Ruger Model Security 9 S/N 383- 97011 9mm pistol.
8	February 5, 2022	Francisco Hernandez	Mike's Outdoors	Diamondback Model AR15 S/N DB2189440 5.56 mm rifle
9	February 5, 2022	Francisco Hernandez	Mike's Outdoors	(1) Kel-Tec Model PMR30 S/N WY9A72 22 mag pistol; (2) Glock Model G19 S/N AFNX982 9mm pistol; (3) Glock Model G19 S/N AFNX981 9mm pistol; (4) Kel-Tec Model PMR30 S/N WY8X21 22 mag pistol.

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
10	March 12, 2022	Eric Jesus Lopez	Double D Pawn & Gun	(1) Tippmann Model M4-22 Pro S/N 041115 22LR pistol; (2) Tippmann Model M4-22 Pro S/N 041113 22LR pistol; (3) Tippmann Model M4-22 Pro S/N 041116 22LR pistol; (4) Glock Model 17 S/N BVFM857 9mm pistol; (5) Glock Model 19 S/N BVUD751 9mm pistol; (6) Glock Model 17 S/N BTVV637 9mm pistol.
11	March 12, 2022	Eric Lopez	Mike's Outdoors	(1) Kel-Tec Model PMR30 S/N WY8X22 22 mag pistol; (2) Glock Model 19 S/N BWGE476 9mm pistol; (3) Glock Model 19 S/N BWGE471 9mm pistol.
12	March 29, 2022	Christian Lopez	Double D Pawn & Gun	(1) Tippmann Model M4-22 S/N 041112 22LR pistol; (2) Ruger Model LCP S/N 379023877 380 pistol; (3) Taurus Model TX 22 S/N 1PT408888 22LR pistol; (4) Taurus Model TX 22 S/N 1PT408863 22LR pistol; (5) Smith & Wesson Model M&P 380 S/N REB4633 380 pistol; (6) Glock Model 19 S/N BWMR821 9mm pistol.

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
13	March 30, 2022	Francisco Hernandez	Double D Pawn & Gun	(1) Glock Model 17 mos S/N BVTC793 9mm pistol; (2) Glock Model 19 S/N BWMR826 9mm pistol; (3) Smith & Wesson Model M&P EZ S/N RDX7363 380 pistol.
14	March 30, 2022	Francisco Hernandez	Mike's Outdoors	(1) Glock Model 19 S/N BUBG844 9mm pistol; (2) Glock Model 19 S/N BUPG814 9mm pistol; (3) Glock Model 17 S/N BVGE357 9mm pistol.
15	April 23, 2022	Savanna Jade Lopez	Double D Pawn & Gun	(1) Glock Model 17 Gen 4 S/N ZHY403 9mm pistol; (2) Glock Model 17 S/N AFXH396 9mm pistol (3) Glock Model 17 S/N AGMA742 9mm pistol (4) Kel-Tec Model PMR-30 S/N WYF128 22WMR pistol (5) Kel-Tec Model PMR-30 S/N WYF043 22WMR pistol (6) Kel-Tec Model PMR-30 S/N WYF043 22WMR pistol (6) Kel-Tec Model PMR-30 S/N WYF126 22WMR pistol (7) Tippmann Arms Model M4-22 Elite S/N 043707 22LR pistol (8) Tippmann Arms Model M4-22 Elite S/N 043706 22LR pistol (9) Tippmann Arms Model M4-22 Elite S/N 043702 22LR pistol (10) Tippmann Arms Model M4-22 Elite S/N 043702 22LR pistol

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
				(11) Tippmann Arms Model M4-22 Elite S/N 043700 22LR pistol (12) Tippmann Arms Model M4-22 Elite S/N 043701 22LR pistol
16	June 11, 2022	Eric Jesus Lopez	H&H Pawn, Gun & Tools, Inc.	(1) Mauser Model 1911 S/N BL89884 .22 pistol; (2) Mauser Model 1911 S/N BL78893 .22 pistol; (3) Mauser Model 1911 S/N B124757 .22 pistol; (4) Mauser Model 1911 S/N B124747 .22 pistol; (5) Taurus Model TX S/N 1PT531089 .22 pistol; (6) Glock Model 42 S/N ACSR080 .380 pistol.
17	July 28, 2022	Eric Jesus Lopez	Double D Pawn & Gun	(1) Glock Model 17 S/N GU409US 9mm pistol; (2) Glock Model 19 S/N ZPZ560 9mm pistol; (3) Glock Model 17 S/N BXFE127 9mm pistol; (4) Glock Model 17 S/N ABPX973 9mm pistol; (5) Glock Model 19 S/N BVTY012 9mm pistol; (6) Glock Model 19 S/N BVTY012 9mm pistol; (7) Kel-Tec Model PMR 30 S/N WWFN18 22 WMR pistol; (8) Kel-Tec Model PMR 30 S/N WYGF20 22 WMR pistol; (9) Kel-Tec Model PMR 30 S/N WYH961 22 WMR pistol; (10) Kel-Tec Model PMR 30 S/N WYH961 22 WMR pistol; (10) Kel-Tec Model PMR 30 S/N WYH961 22 WMR pistol; (10) Kel-Tec Model PMR 30 S/N WYH961 22 WMR pistol;

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
				(11) Kel-Tec Model PMR 30 S/N WYFD13 22 WMR pistol; (12) Kel-Tec Model PMR 30 S/N WYFD10 22 WMR pistol; (13) Kel-Tec Model PMR 30 S/N WYFD12 22 WMR pistol.
18	July 29, 2022	Francisco Hernandez	Double D Pawn & Gun	Glock Model 19 S/N BUTS626 9mm pistol.
19	July 29, 2022	Francisco Hernandez	Mike's Outdoors	(1) Glock Model 19 S/N AGCL590 9mm pistol; (2) Glock Model 19 S/N AGCL592 9mm pistol; (3) Glock Model 17 S/N AFDF242 9mm pistol; (4) Glock Model 17 S/N AFDF241 9mm pistol; (5) Glock Model 17 S/N BWRK226 9mm pistol.
20	August 29, 2022	Francisco Hernandez	Double D Pawn & Gun	(1) Glock Model 19X S/N BWSZ107 9mm pistol; (2) Glock Model 19X S/N ADLX340US 9mm pistol; (3) Smith & Wesson Model M&P 380 Shield S/N RDX7384 380 pistol; (4) Beretta Model 92FS S/N K705727 9mm pistol; (5) Browning Model 1911 380 S/N 51HZT14921 380 pistol; (6) Smith & Wesson Model 380 Shield EZ S/N RCE5383 380 pistol.

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
21	August 30, 2022	Francisco Hernandez	Mike's Outdoors	Winchester Model Wildcat S/N TF614- 21M26196 22LR Rifle
22	October 6, 2022	Francisco Hernandez	Double D Pawn & Gun	(1) Glock Model 45 S/N BWDM462 9mm pistol; (2) Glock Model 17 S/N BVSS560 9mm pistol; (3) Glock Model 45 S/N BVWW304 9mm pistol; (4) Glock Model 19 S/N BVCK856 9mm pistol; (5) Beretta Model 92G S/N BER161086Z 9mm pistol; (6) Beretta Model 92X S/N 92X0058041 9mm pistol.
23	October 6, 2022	Savanna Jade Lopez	Double D Pawn & Gun	(1) Kel-Tec Model PMR-30 S/N WYKD43 22WMR pistol; (2) Bersa Arms Model Thunder 380 Plus S/N K45746 380acp pistol; (3) Bersa Arms Model Thunder 380 Combat S/N K51713 380acp pistol; (4) Glock Model 45 S/N BHZN306 9mm pistol; (5) Taurus Model TX22 Competition S/N 1PT489800 22LR pistol; (6) Glock Model 44 S/N AGZC900 22LR pistol.

Count	Date	Defendant	Licensed Firearm Dealer	Firearm(s)
24	October 6, 2022	Eric Jesus Lopez	Mike's Outdoors	Glock Model G17 S/N AGCD881 9mm pistol; (2) Glock Model G19X S/N BWSW395 9mm pistol; (3) Glock Model G17 S/N BWRE404 9mm pistol; (4) Glock Model G19 S/N BWYC797 9mm pistol; (5) Glock Model G19 S/N BXGK783 9mm pistol; (6) Smith & Wesson Model SD9 S/N FDT0259 9mm pistol.
25	October 7, 2022	Francisco Hernandez	Double D Pawn & Gun	(1) Chiappa Model 1911-22 S/N CFIT22C03276 22LR pistol; (2) Chiappa Model 1911-22 S/N CFIT22C03271 22LR pistol; (3) Beretta Model M9A1-22 S/N BM064233 22LR pistol; (4) Beretta Model M9A1-22 S/N BM064215 22LR pistol; (5) Beretta Model M9A1-22 S/N BM064215 22LR pistol;

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

# <u>FORFEITURE ALLEGATION</u> [18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One through Twenty-Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to

Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Twenty-Five of this Indictment involving violations of Title 18, United States Code, Sections 922(g)(1), 924(a)(1)(A), and 924(a)(8), the defendants, EDUARDO GARCIA a/k/a Eduardo Garcia Olvera a/k/a Eduardo Olvera Garcia a/k/a Lalo, ERIC LOPEZ, ERIC JESUS LOPEZ, SAVANNA JADE LOPEZ, CHRISTIN LOPEZ, and FRANCISCO HERNANDEZ, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, Section 2461(c), any and all of the defendants' right, title and interest in all firearms and ammunition involved in the commission of the offenses, including but not limited to:

- One (1) 20 GA Browning Light Twenty shotgun, serial number 07218NV231;
- One (1) 20 GA Mossberg model 185K shotgun with no serial number;
- One (1) 9mm LUGER Ruger PC Carbine, serial number 912-66302; and
- Approximately two thousand nine hundred and forty (2,940) rounds of assorted ammunition.

TRUE BILL:

Pursuant to the E-Government Act, the original indictment has been filed under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY

CHRISTOPHER J. WILSON United States Attorney

ERIN A. CORNELL, CA BAR # 227135

Assistant United States Attorney